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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
Implementation of Section 9)
of the Communications Act)
)
Assessment and Collection of)
Regulatory Fees for the 1994)
Fiscal Year)

MD Docket No. 94-19

Comments of Cable Services, Inc., an independent cable
operator and owner regarding user fees on small systems



Roy A. Sheppard
President/Owner
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March 31, 1994

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Comments

The Commission, in its Notice of Proposed Rulemaking in MD Docket No. 94-19, is extremely discriminatory in its method of setting fees for small cable television, particularly in the under 1000 customer range.

The proposed \$370 flat fee per system, and \$370 per 1,000 subscribers or any part thereof above 1,000 yields per customer costs that will inflict economic harm on small systems.

A cable system of	10 customers	cost per home:	\$37.00
A cable system of	35 customers	cost per home:	\$10.57
A cable system of	1000 customers	cost per home:	\$.37
A cable system of	1001 customers	cost per home:	\$.74
A cable system of	20,000 customers	cost per home:	\$.37
A cable system of	100000 customers	cost per home:	\$.37

Exhibit A lists a variety of size systems from 1 to 16,001, showing the User Fee and the discriminatory cost per subscriber.

Exhibit B is a line graph showing the relative cost per cable home in systems from 10 to 10,001.

Exhibit C is a line graph that shows how the proposed user fee in systems under 10,001 looks more like a graph of a recent California earthquake than a uniform fee.

There is no rational explanation to why the cost per small cable system customer should be 5, 10, 20, 50, or **100 times** more than any other cable customer in the United States. There is no rational explanation why the Federal Communications Commission, charged by the Congress of the United States to insure cable television consumers are treated fairly would propose such a discriminatory pricing scheme. The Federal Communications Commission should adopt a Uniform Pricing method that is very simple and fair:

37 cents per basic cable television customer.

EQUIVALENT COST PER CABLE HOME OF PROPOSED FCC USER FEE

# of Subs	\$ per System	\$ per Sub		# of Subs	\$ per System	\$ per Sub		# of Subs	\$ per System	\$ per Sub		# of Subs	\$ per System	\$ per Sub
1	\$370.00	\$370.00		51	\$370.00	\$7.25		470	\$370.00	\$0.79		3600	\$1,480.00	\$0.41
2	\$370.00	\$185.00		52	\$370.00	\$7.12		480	\$370.00	\$0.77		3800	\$1,480.00	\$0.39
3	\$370.00	\$123.33		53	\$370.00	\$6.98		490	\$370.00	\$0.76		4000	\$1,480.00	\$0.37
4	\$370.00	\$92.50		54	\$370.00	\$6.85		500	\$370.00	\$0.74		4001	\$1,850.00	\$0.46
5	\$370.00	\$74.00		55	\$370.00	\$6.73		525	\$370.00	\$0.70		4200	\$1,850.00	\$0.44
6	\$370.00	\$61.67		56	\$370.00	\$6.61		550	\$370.00	\$0.67		4400	\$1,850.00	\$0.42
7	\$370.00	\$52.86		57	\$370.00	\$6.49		575	\$370.00	\$0.64		4600	\$1,850.00	\$0.40
8	\$370.00	\$46.25		58	\$370.00	\$6.38		600	\$370.00	\$0.62		4800	\$1,850.00	\$0.39
9	\$370.00	\$41.11		59	\$370.00	\$6.27		625	\$370.00	\$0.59		5000	\$1,850.00	\$0.37
10	\$370.00	\$37.00		60	\$370.00	\$6.17		650	\$370.00	\$0.57		5001	\$2,220.00	\$0.44
11	\$370.00	\$33.64		70	\$370.00	\$5.29		675	\$370.00	\$0.55		5200	\$2,220.00	\$0.43
12	\$370.00	\$30.83		80	\$370.00	\$4.63		700	\$370.00	\$0.53		5300	\$2,220.00	\$0.42
13	\$370.00	\$28.46		90	\$370.00	\$4.11		750	\$370.00	\$0.49		5400	\$2,220.00	\$0.41
14	\$370.00	\$26.43		100	\$370.00	\$3.70		800	\$370.00	\$0.46		5600	\$2,220.00	\$0.40
15	\$370.00	\$24.67		110	\$370.00	\$3.36		850	\$370.00	\$0.44		5800	\$2,220.00	\$0.38
16	\$370.00	\$23.13		120	\$370.00	\$3.08		900	\$370.00	\$0.41		6000	\$2,220.00	\$0.37
17	\$370.00	\$21.76		130	\$370.00	\$2.85		950	\$370.00	\$0.39		6001	\$2,590.00	\$0.43
18	\$370.00	\$20.56		140	\$370.00	\$2.64		1000	\$370.00	\$0.37		6200	\$2,590.00	\$0.42
19	\$370.00	\$19.47		150	\$370.00	\$2.47		1001	\$740.00	\$0.74		6400	\$2,590.00	\$0.40
20	\$370.00	\$18.50		160	\$370.00	\$2.31		1025	\$740.00	\$0.72		6600	\$2,590.00	\$0.39
21	\$370.00	\$17.62		170	\$370.00	\$2.18		1050	\$740.00	\$0.70		6800	\$2,590.00	\$0.38
22	\$370.00	\$16.82		180	\$370.00	\$2.06		1075	\$740.00	\$0.69		7000	\$2,590.00	\$0.37
23	\$370.00	\$16.09		190	\$370.00	\$1.95		1100	\$740.00	\$0.67		7001	\$2,960.00	\$0.42
24	\$370.00	\$15.42		200	\$370.00	\$1.85		1150	\$740.00	\$0.64		7500	\$2,960.00	\$0.39
25	\$370.00	\$14.80		210	\$370.00	\$1.76		1200	\$740.00	\$0.62		8000	\$2,960.00	\$0.37
26	\$370.00	\$14.23		220	\$370.00	\$1.68		1250	\$740.00	\$0.59		8001	\$3,330.00	\$0.42
27	\$370.00	\$13.70		230	\$370.00	\$1.61		1300	\$740.00	\$0.57		8500	\$3,330.00	\$0.39
28	\$370.00	\$13.21		240	\$370.00	\$1.54		1350	\$740.00	\$0.55		9000	\$3,330.00	\$0.37
29	\$370.00	\$12.76		250	\$370.00	\$1.48		1400	\$740.00	\$0.53		9001	\$3,700.00	\$0.41
30	\$370.00	\$12.33		260	\$370.00	\$1.42		1500	\$740.00	\$0.49		9500	\$3,700.00	\$0.39
31	\$370.00	\$11.94		270	\$370.00	\$1.37		1600	\$740.00	\$0.46		10000	\$3,700.00	\$0.37
32	\$370.00	\$11.56		280	\$370.00	\$1.32		1700	\$740.00	\$0.44		10001	\$4,070.00	\$0.41
33	\$370.00	\$11.21		290	\$370.00	\$1.28		1800	\$740.00	\$0.41		10500	\$4,070.00	\$0.39
34	\$370.00	\$10.88		300	\$370.00	\$1.23		1900	\$740.00	\$0.39		11000	\$4,070.00	\$0.37
35	\$370.00	\$10.57		310	\$370.00	\$1.19		2000	\$740.00	\$0.37		11001	\$4,440.00	\$0.40
36	\$370.00	\$10.28		320	\$370.00	\$1.16		2001	\$1,110.00	\$0.55		11500	\$4,440.00	\$0.39
37	\$370.00	\$10.00		330	\$370.00	\$1.12		2100	\$1,110.00	\$0.53		12000	\$4,440.00	\$0.37
38	\$370.00	\$9.74		340	\$370.00	\$1.09		2200	\$1,110.00	\$0.50		12001	\$4,810.00	\$0.40
39	\$370.00	\$9.49		350	\$370.00	\$1.06		2300	\$1,110.00	\$0.48		12500	\$4,810.00	\$0.38
40	\$370.00	\$9.25		360	\$370.00	\$1.03		2400	\$1,110.00	\$0.46		13000	\$4,810.00	\$0.37
41	\$370.00	\$9.02		370	\$370.00	\$1.00		2500	\$1,110.00	\$0.44		13001	\$5,180.00	\$0.40
42	\$370.00	\$8.81		380	\$370.00	\$0.97		2600	\$1,110.00	\$0.43		13500	\$5,180.00	\$0.38
43	\$370.00	\$8.60		390	\$370.00	\$0.95		2700	\$1,110.00	\$0.41		14000	\$5,180.00	\$0.37
44	\$370.00	\$8.41		400	\$370.00	\$0.93		2800	\$1,110.00	\$0.40		14001	\$5,550.00	\$0.40
45	\$370.00	\$8.22		410	\$370.00	\$0.90		2900	\$1,110.00	\$0.38		14500	\$5,550.00	\$0.38
46	\$370.00	\$8.04		420	\$370.00	\$0.88		3000	\$1,110.00	\$0.37		15000	\$5,550.00	\$0.37
47	\$370.00	\$7.87		430	\$370.00	\$0.86		3001	\$1,480.00	\$0.49		15001	\$5,920.00	\$0.39
48	\$370.00	\$7.71		440	\$370.00	\$0.84		3100	\$1,480.00	\$0.48		15500	\$5,920.00	\$0.38
49	\$370.00	\$7.55		450	\$370.00	\$0.82		3200	\$1,480.00	\$0.46		16000	\$5,920.00	\$0.37
50	\$370.00	\$7.40		460	\$370.00	\$0.80		3400	\$1,480.00	\$0.44		16001	\$6,290.00	\$0.39

Cost per cable subscriber
in systems from 10 to 10001



